

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

HUANG ZHIYANG,

Plaintiff,

v.

**45.COM, an Internet domain name, and
JOHN DOE**

Defendants.

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Civil Action No. 1:20-cv-836-LO-IDD

I, Hsiwen Lo, declare as follows.

1. My name is Hsiwen Lo. I am an attorney admitted to practice law in California (State Bar No. 286649). I am counsel for the Movant, Mr. Huang Zhiyang.

2. I submit this Declaration in support of the Movant's reply regarding its Motion to Intervene, Motion to Reopen, and Motion for Relief from the Default Judgment.

3. The website relied upon by plaintiff, domaintools.com, provides a tool for keyword searches of the WHOIS records.

4. Around May 1, I searched the WHOIS records using the keyword "whoisprotecte@gmail.com" with the keyword-search tool. The WHOIS records I found consistently show that the email "whoisprotecte@gmail.com" is associated with an individual named "Zhangling Xu" with an address of No. 361, NiuZhuang Village, Linqi Town, Linzhou, Henan, China. The WHOIS records also show that the induvial has a phone number "+1.7247690995."

5. **Exhibit HLO01** includes a snapshot and a PDF printout of the WHOIS record of “864.so” dated 2018-10-08.

6. **Exhibit HLO02** includes a snapshot and a PDF printout of the WHOIS record of “864bet.com” dated 2018-11-15.

7. **Exhibit HLO03** includes a snapshot and a PDF printout of the WHOIS record of “864vip.com” dated 2018-11-10.

8. **Exhibit HLO04** includes a snapshot and a PDF printout of the WHOIS record of “864864.com” dated 2018-10-17.

9. **Exhibit HLO05** includes a snapshot and a PDF printout of the WHOIS record of “mynew864.com” dated 2018-12-07.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on May 13, 2021.

Hsiwen Lo, Esq.

A handwritten signature in brown ink, consisting of a large, stylized 'L' followed by a horizontal line with a wavy end.